

Remarks & Arguments

In the Office Action, the Examiner noted that Claims 32-62 are pending in the application, Claims 32-38 and 47-62 are withdrawn, and that Claims 39-46 are rejected. By this amendment, Claim 39 has been amended, and Claims 63-74 have been added. Thus, Claims 32-74 are pending in the application. The amendments to the claims do not add new matter to the application. The Examiner's rejections are traversed below.

*Rejections Under 35 U.S.C. 102*

Claims 39-46 stand rejected under 35 U.S.C. 102 as being anticipated by U.S. Patent No. 6,218,708 to Burr. **Claim 39**, as amended, recites "a deep n well segmented into a plurality of substructures proximate each one of said plurality of transistors, wherein n-type material of said deep n well is coupled to said principal operating voltage." In contrast, Burr clearly only discloses "a non-continuous or patterned subsurface n+ layer" having a single gap proximate transistors formed in p-type wells and having no substructures proximate the transistors in the p-type wells. Accordingly, Applicants respectfully submit that Claim 39 is patentable over Burr. Applicants therefore request that the anticipation rejection of Claim 39 be withdrawn and that Claim 39 be allowed.

**Claims 40-46** are allowable by virtue of their dependency on respective base Claim 39, as well as the additional elements they recite. Accordingly, Applicants respectfully request that the anticipation rejection of Claims 40-46 be withdrawn and that Claims 40-46 be allowed.

With regard to new **Claim 63**, the Applicants respectfully assert that Burr does not disclose or suggest that the deep n well capacitor structure has a surface area selected to provide a specified amount of decoupling capacitance between one or more of said plurality of transistors and said principal operating voltage.

With regard to new **Claim 64**, the Applicants respectfully assert that Burr does not disclose or suggest that a plurality of gaps between the plurality of substructures do not close under bias conditions.

With regard to new **Claim 65**, the Applicants respectfully assert that Burr does not disclose or suggest that the plurality of substructures provide connectivity between the p-type material beneath and above the deep n-well.

With regard to new **Claim 66**, the Applicants respectfully assert that Burr does not disclose or suggest a separation well disposed between the plurality of substructures and between the p-type material beneath and above the deep n-well.

With regard to new **Claim 67**, the Applicants respectfully assert that Burr does not disclose or suggest a separation well for increasing coupling between the p-type material beneath and above the deep n-well

With regard to new **Claim 68**, the Applicants respectfully assert that Burr does not disclose or suggest a plurality of deep n-wells each segmented into a plurality of substructures

proximate each one of said plurality of transistors, and an interlayer coupling between the plurality of deep n-wells.

With regard to new **Claim 69**, the Applicants respectfully assert that Burr does not disclose or suggest a deep well of a second conductivity type disposed between the one or more wells of said first conductivity type and a substrate of the first conductivity type, wherein the deep well includes a plurality of substructures having a plurality gaps wherein the one or more wells of said first conductivity type are coupled to said substrate.

With regard to new **Claims 70-74**, are allowable by virtue of their dependency on respective base Claim 69, as well as the additional elements they recite.

### Conclusion

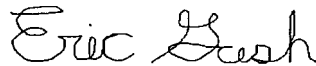
For all the reasons advanced above, Applicants respectfully submit that the present application is in condition for allowance and that action is earnestly solicited. The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

The Commissioner is hereby authorized to charge any additional fees, which may be required for this amendment, or credit any overpayment, to Deposit Account 504160. In the event that an extension of time is required, or may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to

Appl. No. 10/808,225  
Amdt. Dated 4/24/07  
Reply to Office Action of 1/24/07

charge any fee for such an extension of time or credit any overpayment for an extension of time  
to Deposit Account 504160.

Respectfully submitted,  
MURABITO, HAO & BARNES LLP

A handwritten signature in cursive script, reading "Eric Gash". The signature is written in dark ink and is positioned above a horizontal line.

Dated: April 24, 2007

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